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American Airlines®

November 22, 1995

DEPT. OF TRANSPORTATION
DOCKET SECTION

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Jack Calloway
Office of Airline Information, K-25
Bureau of Transportation Statistics
Department of Transportation
400 7th Street, S.W.
Room 4125
Washington, D.C. 20590

OST-95-744-4

Re: Passenger Origin-Destination Survey Reports,
(Code-Sharings), Docket OST-95-744

Dear Mr. Calloway:

American Airlines, Inc. hereby comments on the Department's October 23, 1995 Notice of Proposed Rulemaking pertaining to Passenger Origin-Destination Survey Reports (60 Fed. Reg. 54407).

American fully supports the Department's efforts to gather more accurate data on the competitive effects of international code-sharing on U.S. carriers. We have long advocated identification of code-share marketing and operating carriers to the Department and to passengers.

Regrettably, we believe that the proposed January 1, 1996 implementation date for conversion to the expanded reporting format is unrealistic. The changes in data record structure and in reporting methodology required by the Department's Accounting and Reporting Directive No. 194 will require substantial programming modifications to American's revenue accounting and traffic reporting systems.

Without a more detailed proposal addressing the many technical issues raised by this directive, we cannot commit to a firm implementation date. However, if the Department, in consultation with the industry, can resolve these concerns, we believe that conversion for the reporting period beginning April 1, 1996 would be feasible.

Among areas where clarification is needed is in the survey reporting rules. We believe that the existing reporting rules, which require the first U.S. carrier of a sampled itinerary to report the entire itinerary, may be ambiguous in a code-sharing environment. Data may not be accurately captured because of difficulty identifying when a carrier should report. For example, valuable information could be lost if **single-**ticket flights ticketed by a U.S. carrier but operated by a

foreign carrier go unreported because the operating foreign carrier is not required to report survey data. Also, in interline itineraries involving code-sharing, where the first U.S. carrier is not a party to a code-share later in the itinerary, the carrier reporting would have no reliable method of correctly identifying the operating carriers of code-share connecting segments.

We have convened an internal committee of technical experts to prepare substantive comments and suggestions for clarification of the proposed rule. We request that we be allowed the opportunity to submit supplementary detailed comments on or before December 8, 1995.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert A. Britton". The signature is written in a cursive, flowing style.

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